

Minutes of TMPWG Meeting of February 27, 1998
Winston Salem NC

Conferees in attendance: Dave Fashimpaur, Terry Harrison, Rich Hovan, Dennis Knisley, Tom McGrath, Lawrence Otwell, Bill Passie, John Preczewski, Dave Schanbacher, Vernon Schievelbein, Shirish Shimpi, Jim Wright

Minutes recorded by: John Preczewski

Report on Source Workgroup Meetings:

Dennis Knisley reported on the CC meeting. Dennis suggested that the TMPWG issue a short informational fact sheet on POMs, to which the TMPWG agreed. At the CC meeting a definition of 'solid waste' was provided. Dennis reported that the Pollution Prevention Work Group has offered 'good combustion practice', such as maintenance requirements, operator training, etc., as a viable alternative or complement to a MACT floor numeric value.

Tom McGrath reported on the Boiler SWG. BSWG is working on a list of HAPS of concern and the associated levels of detection that would be required for a test plan. A test plan has not yet been drafted.

Dave Schanbacher reported on the Process Heaters SWG. PHSWG is still working on identifying data gaps in order to proceed in delineating appropriate test plan objectives.

John Preczewski reported on the Combustion Turbine SWG. CTSWG is proceeding with a technical analysis and justification for no numeric and possibly no MACT requirements for the control of HAPS on combustion turbines that fire on gas (natural, refinery and possibly other fuels.) Low levels of HAPS, the nature and stability of the turbine combustion process, lack of operational variables to effect control, and a general lack of post combustion control options lead the list of potential justifying arguments. Meanwhile the CTSWG is continuing on a parallel course with a proposed test plan, a final version of which is expected in the next few weeks.

William Passie reported on the Reciprocating Internal Combustion Engine SWG. RICE has a final test plan and has solicited quotes for catalyst for the test program. EPA has allocated over \$600,000 for the test program but expects a shortfall. Testing is moving forward with EPA funding/oversight.

Dennis Knisley reported on the Incinerator SWG. The ISWG is in the preliminary stages of designing a test program.

Subgroup Reports: Vernon Schievelbein reported that the Compliance Testing subgroup is reviewing potential problems/conflicts associated with existing test methods and also at advances in the field of testing that may have applicability to the ICCR effort.

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John Preczewski reported on the Monitoring subgroup. Effort will be directed at evaluating and reporting costs and applicability of various periodic monitoring alternatives and not toward duplicating cost models already in existence.

Agenda Items for Discussion: The question was raised whether the TMPWG should modify the cost model to reflect the RICE comment concerning a desire for more cost detail. It was agreed that the model's sophistication was sufficient in its present format. Any benefits from cost refinement could be dwarfed by various unpredictable site specific cost variations, and refinement therefore is not considered useful.

Mid-Course Assessment: Terry presented a status report on outputs due from the TMPWG. All short term requests from the individual source workgroups have been adequately responded to and addressed using the existing TMPWG procedure. This procedure uses SWG contact people assigned to follow the individual SWGs and has been working. Hence, TMPWG will continue to rely on this procedure to address short term requests. TMPWG will rely on these contact people's judgment to keep the rest of us informed and to ask opinions on potentially controversial issues.

Future outputs from the compliance methods and monitoring subgroups are where we should focus our efforts in order to have this critical information available in the time frame needed when the SWGs start addressing these issues.

Action Items:

A. Informational POM fact sheet: Terry Harrison, possibly Karl Loos (not in attendance), and Shirish Shimpi (support information)

B. Vernon Schievelbein and John Preczewski to notify all TMPWG members of subgroup meetings, and to provide all TMPWG members with distributed material.

Next TMPWG Phone Conference Call: An April 9th, 1998 call was scheduled for 11:00 am EST. The call number to be arranged and distributed by Terry Harrison. At that time a need for meeting and if needed an agenda for the Fort Collins, Colorado meeting for May 1st will be discussed.

Closing: The regular TMPWG meeting closed at 2:00 pm EST. The Monitoring subgroup broke out for a separate meeting.

Monitoring Subgroup Meeting: Members of the Monitoring subgroup that were present for the regular meeting agreed upon a format for the output document to be distributed to the source work groups. Dennis Knisley will rough out a draft format by March 13, 1998. John Preczewski and new group member Richard Hovan will develop a detail draft version utilizing that format and distribute it to TMPWG members by April 6, 1998. The draft will be reviewed by members and discussed at the April 9th conference call meeting. A final draft version, based upon comment and

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discussion, will be distributed to the source workgroups by April 15, 1998. The purpose of this distribution will be to see if TMPWG format is customer friendly and to have the SWGs identify additional monitoring options they would like to see discussed.